IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

:

IN RE : CHAPTER 13

KYESHA CARTER : CASE NO: 19-12866ELF

:

Debtor

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS

The Debtor, through counsel, responds to the motion of William C. Miller, Esquire, Chapter 13 Standing Trustee (the "Trustee"), to dismiss (the "Motion" (Doc. No. 39) as follows:

- 1. The Motion asserts that Debtor is not making payments.
- 2. Since the Motion was filed, Debtor has tendered two payments totaling \$945.
- 3. Debtor expects to make another payment on or before March 12.

WHEREFORE, Debtor prays that this Court enter an Order DENYING the Motion.

/s/ Alfonso G. Madrid
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